

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

CIVIL ACTION NO.: 3:20-cv-10628-MGM

JEREMY HOLLINS,)
Plaintiff)
)
vs.)
)
THE CITY OF WEST SPRINGFIELD,)
THOMAS SUDNICK, JOSEPH WOLOWICZ,)
JOSEPH CASEY, NATHAN O'BRIEN,)
ADAM POLASTRY, RONALD)
CAMPURCIANI, JOHN/JANE DOES)
(Current or former employees of the City of)
West Springfield), and MASSACHUSETTS)
INTERLOCAL INSURANCE ASSOCIATION,)
Defendants)

**L.R. 16.1 JOINT STATEMENT OF THE PARTIES AND
PROPOSED DISCOVERY AND PRETRIAL SCHEDULE**

The parties, having conferred through their counsel, submit the following Joint Statement in accordance with Federal Rules of Civil Procedure 16, Local Rule 16.1(d) and the Court's June 19, 2020 Notice of Scheduling Conference. The proposed dates reflect the ongoing COVID-19 pandemic and the anticipated logistical difficulties and delays that may occur in propounding discovery materials and scheduling depositions. In the event that conditions improve, the parties – by agreement – may seek leave of this Court to revisit and accelerate certain deadlines.

Timetable for Discovery and Motion Practice

- I. **Initial Disclosures:** Initial disclosures required by Fed. R. Civ. P. 26(a)(1) must be completed by August 31, 2020.
- II. **Amendments to Pleadings:** Any motion seeking leave to add new parties shall be sought as soon as an attorney reasonably can be expected to have become aware of the identity of the proposed new party, and shall conform to the service requirements

imposed by L.R. 15.1(b). Except for good cause shown, no motion to amend the pleadings to assert new claims or defenses may be filed after May 1, 2021 or the completion of non-expert discovery, whichever is later.

III. Fact Discovery - Interim Deadlines

- a. Completion of non-expert discovery, including service of and responses to all written discovery (including requests for admissions) and non-expert depositions by June 4, 2021.

IV. Case Management Conference: A case management conference should take place on June 14, 2021, or on a date set by the court.

V. Expert Discovery

- a. Disclosure
 - i. Plaintiff's designation of trial expert(s) and disclosure of information required by Fed. R. Civ. P. 26(a)(2) no later than July 21, 2021.
 - ii. Defendants' designation of trial expert(s) and disclosure of information required by Fed. R. Civ. P. 26(a)(2) no later than August 16, 2021.
- b. Depositions
 - i. Completion of expert depositions shall be concluded by October 15, 2021.

VI. Dispositive Motions

- i. Dispositive motion(s) shall be filed by January 7, 2022.
- ii. Opposition(s) to disposition motion(s) shall be filed by February 7, 2022.
- iii. Replies, if any shall be filed by February 18, 2022.

VII. Discovery Motions

- a. The parties agree that discovery disputes and requests for guidance, which cannot be resolved after a reasonable effort to confer and reach a resolution has been

made by the parties involved, shall be first submitted to the Court in letter form.

If the Court cannot resolve the matter without formal briefing, a briefing schedule for the issue will be set.

VIII. Certifications

Pursuant to L.R. 16.1, the parties have discussed settlement and ADR with their respective clients.

Respectfully submitted,

THE PLAINTIFF,
JEREMY HOLLINS

THE DEFENDANT,
THE CITY OF WEST SPRINGFIELD,
THOMAS SUDNICK, JOSEPH WOLOWICZ,
JOSEPH CASEY, NATHAN O'BRIEN, ADAM
POLASTRY AND RONALD CAMPURCIANI

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 28th day of July 2020.

Subscribed under the penalties of perjury.

/s/ Nancy Frankel Pelletier, Esq.

Nancy Frankel Pelletier, Esq.